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**Board of Vocational Nursing
and Psychiatric Technicians**

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**BEFORE THE
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2007-81

**SUZANNE RACHELLE PRINCE-
PILGRIM
726 Davenport Way
Lincoln, CA 95825**

A C C U S A T I O N

Vocational Nurse License No. VN 192754

Respondent.

Complainant alleges:

PARTIES

1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians, Department of Consumer Affairs.

2. On or about August 30, 2000, the Board of Vocational Nursing and Psychiatric Technicians issued Vocational Nurse License Number VN 192754 to Suzanne Rachelle Prince-Pilgrim (Respondent). The Vocational Nurse License was in full force and effect at all times relevant to the charges brought herein and expired on April 30, 2010.

JURISDICTION

3. This Accusation is brought before the Board of Vocational Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, under the authority of the following laws.

1 All section references are to the Business and Professions Code unless otherwise indicated.

2 4. Section **118(b)** of the Code provides, in pertinent part, that the expiration of a license
3 shall not deprive the Board jurisdiction to proceed with a disciplinary action during the period
4 within which the license may be renewed, restored, reissued or reinstated. Under section 2892.1
5 of the Code, the Board may renew an expired license at any time within four years after the
6 expiration.

7 5. Section **2875** of the Business and Professions Code (Code) provides, in pertinent part,
8 that the Board may discipline the holder of a vocational nurse license for any reason provided in
9 Article 3 (commencing with section 2875) of the Vocational Nursing Practice Act.

10 **STATUTORY PROVISIONS**

11 6. Section **490** of the Code provides, in pertinent part, that the Board may suspend or
12 revoke a license when it finds that the licensee has been convicted of a crime substantially related
13 to the qualifications, functions or duties of a licensed vocational nurse.

14 7. Section **2878** of the Code states in pertinent part:

15 The Board may suspend or revoke a license issued under this chapter [the Vocational
16 Nursing Practice Act (Bus. & Prof. Code, 2840, et seq.)] for any of the following:

17 . . .

18 (f) Conviction of a crime substantially related to the qualifications, functions, and duties of
19 a licensed vocational nurse, in which event the record of the conviction shall be conclusive
20 evidence of the conviction.

21 . . .

22 (j) The commission of any act involving dishonesty, when that action is related to the duties
23 and functions of the licensee.

24 . . .

25 **COST RECOVERY**

26 8. Section **125.3** of the Code provides, in pertinent part, that the Board may request the
27 administrative law judge to direct a licentiate found to have committed a violation or violations of
28 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and

1 enforcement of the case.

2 **FIRST CAUSE FOR DISCIPLINE**

3 (Criminal Conviction)

4 9. Respondent is subject to disciplinary action under sections 490 and 2878(f) of the
5 Code in that she has been convicted of crimes substantially related to the qualifications, functions
6 and duties of a licensed vocational nurse, as follows:

7 10. On or about April 28, 2011, in Marin Superior Court Case No. SC169889A,
8 Respondent was convicted of having violated California Penal Code section 532(a) (theft by false
9 pretenses). The circumstances underlying the conviction were as follows:

10 11. On or about September 29, 2006, to November 30, 2006, Respondent falsely billed
11 her employer for hours that Respondent claimed that she had worked as a vocational nurse at San
12 Quentin Prison when, in truth, Respondent had not worked those hours. Respondent's false
13 claims resulted in an overpayment to her by her employer of \$28,275.00.

14 **SECOND CAUSE FOR DISCIPLINE**

15 (Dishonest Acts)

16 12. Respondent is subject to disciplinary action under section 2878(j) of the Code in that
17 she committed acts involving dishonesty that were related to the duties and functions of the
18 licensee, as set forth above in paragraph 11.

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21 **PRAYER**

22 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
23 and that following the hearing, Board of Vocational Nursing and Psychiatric Technicians issue a
24 decision:

25 1. Revoking or suspending Vocational Nurse License Number VN 192754, issued to
26 Suzanne Rachelle Prince-Pilgrim;

27 2. Ordering Suzanne Rachelle Prince-Pilgrim to pay the Board of Vocational Nursing
28 and Psychiatric Technicians the reasonable costs of the investigation and enforcement of this

1 case, pursuant to Business and Professions Code section 125.3;

2 3. Taking such other and further action as deemed necessary and proper.

3
4 DATED: June 6, 2011


TERESA BELLO-JONES, J.D., M.S.N., R.N.

Executive Officer

Board of Vocational Nursing and Psychiatric Technicians

Department of Consumer Affairs

State of California

Complainant